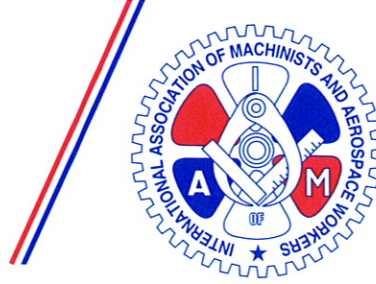


**International
Association of
Machinists and
Aerospace Workers**



9000 Machinists Place
Upper Marlboro, Maryland 20772-2687

Area Code 301
967-4500



August 27, 2009

Subj: FTZ 82, Application for Subzone Authority, ThyssenKrupp Steel and Stainless USA, LLC, Notice of Public Hearing and Reopening of Comment Period — Appearance of Daniel Scott Rich, President and Directing Business Representative IAM Local Lodge 1943

Mr. Andrew McGilvray
Executive Secretary
Foreign Trade Zone Board
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Room 2111
Washington, DC 20230

Dear Mr. McGilvray:

Pursuant to the announcement made in the Federal Register on August 3, 2009, regarding "Foreign Trade Zone 82, Application for Subzone Authority, ThyssenKrupp Steel and Stainless USA, LLC, Notice of Public Hearing and Reopening of Comment Period," the IAM Local Lodge 1943 will be participating in and appearing at the aforementioned hearing on September 10, 2009. Scott Rich, President and Directing Business Representative of IAM Local Lodge 1943 will be appearing at the hearing. A summary of our remarks are attached.

Please confirm receipt of this document via email to oherrnstadt@iamaw.org.

Sincerely,

Owen E. Herrnstadt
Director of Trade and Globalization

OEH:cep

Attachment

cc: R. Thomas Buffenbarger
Lynn Tucker
Daniel S. Rich

SUMMARY OF COMMENTS OF THE IAM LOCAL LODGE 1943, (Scott Rich)
Public Hearing, September 10, 2009
(Docket 51-2008)

Local Lodge 1943 of the International Association of Machinists and Aerospace Workers (“IAM Local 1943”) represents over 1,600 workers at Middletown Works of AK Steel in Middletown, Ohio (“Middletown Works”). Workers at this facility, and elsewhere in the United States, would be adversely affected by granting the request for special purpose subzone status for ThyssenKrupp Steel and Stainless, USA, LLC (“ThyssenKrupp”). Among other things, permitting the Alabama site to import inputs duty free would significantly disadvantage competed U.S. mills, such as Middletown Works, that are currently required to pay duties on their imports. Granting such an advantage to ThyssenKrupp would be unfair and have a significantly negative impact on workers represented by IAM Local 1943 at AK Steel.

Granting the application would also have serious consequences to workers throughout the U.S. steel and related industries. Over five million manufacturing jobs have been lost in the U.S., in the past few years, many in the steel industry. Given the current economic crisis, reflected by an unemployment rate that has surged to over 9%, the Foreign Trade Zones Board must not take any action that would further contribute to growing unemployment. If accepted, the request reflected by the application would place further pressure on an already distressed industry and would greatly exacerbate current unemployment.

Contrary to having a positive effect on the U.S. economy, the application, if granted, would adversely affect the U.S. economy, as explained in other opposing comments submitted to the Foreign Trade Zones Board concerning this matter.

The application fails to meet the required standards for granting approval of such a request (see, 15 C.F.R. Sec. 400.31(a), (b)(2), and (c)(3)). In view of the aforementioned, the IAM, urges the Foreign-Trade Zones Board to reject the application.